

Name: Jerry Ernest Lopez  
Address: 3380 S 1000 W South salt lake, ut, 84119  
Telephone: 801-359-4142  
Email: Jlopeezy776@gmail.com

RECEIVED US Dist Court-UT  
JAN 21 '22 AM 09:13

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH  
Northern DIVISION

Jerry Ernest Lopez  
(Full Name)

PLAINTIFF

vs.

Davis County

DEFENDANTS

CIVIL RIGHTS COMPLAINT  
(42 U.S.C §1983, §1985)

Case: 1:22-cv-00012  
Assigned To : Pead, Dustin B.  
Assign. Date : 1/21/2022  
Description: Lopez v Davis County

A. JURISDICTION

1. Jurisdiction is proper in this court according to:

- a. ☒ 42 U.S.C. §1983  
b. ☐ 42 U.S.C. §1985  
c. ☐ Other (Please Specify) \_\_\_\_\_

2. NAME OF PLAINTIFF Jerry Ernest Lopez  
IS A CITIZEN OF THE STATE OF Utah

PRESENT MAILING ADDRESS: 3380 S 1000 W  
South salt lake, ut, 84119

3. NAME OF FIRST DEFENDANT Davis County  
IS A CITIZEN OF Farmington, UT  
(City and State)

IS EMPLOYED AS Davis County Jail at 800 W State St Farmington  
(Position and Title if Any) (Organization) Utah, 84025  
Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES ☒ NO ☐ If your answer is "YES" briefly explain.

facility in which I was  
incarcerated

4. NAME OF SECOND DEFENDANT \_\_\_\_\_  
(If applicable)

IS A CITIZEN OF \_\_\_\_\_  
(City and State)

IS EMPLOYED AS \_\_\_\_\_ at \_\_\_\_\_  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES ☐ NO ☐ If your answer is "YES" briefly explain.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. NAME OF THIRD DEFENDANT \_\_\_\_\_  
(If applicable)

IS A CITIZEN OF \_\_\_\_\_  
(City and State)

IS EMPLOYED AS \_\_\_\_\_ at \_\_\_\_\_  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO \_\_\_. If your answer is "YES" briefly explain.

---

---

---

6. NAME OF FOURTH DEFENDANT \_\_\_\_\_  
(If applicable)

IS A CITIZEN OF \_\_\_\_\_  
(city and State)

IS EMPLOYED AS \_\_\_\_\_ at \_\_\_\_\_.  
(Position and Title if Any) (Organization)

Was the defendant acting under the authority or color of state law at the time these claims occurred?

YES \_\_\_ NO \_\_\_. If your answer is "YES" briefly explain.

---

---

---

(Use additional sheets of paper if necessary.)

B. NATURE OF CASE

1. Why are you bringing this case to court? Please explain the circumstances that led to the problem.

While being detained I experienced Jail officials participating in official misconduct and failure of duty, also insufficient request / grievance process and Discrimination and harassment on and off duty by one Deputy James Peasnell, and several unanswered voluntary statements to investigations

C. CAUSE OF ACTION

1. I allege that my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: (If necessary you may attach additional pages)

a. (1) Count I: Official misconduct failure of duty

- (2) Supporting Facts: (Describe exactly what each defendant did or did not do. State the facts clearly in your own words without citing legal authority or arguments.)

During my incarceration I  
experienced deputies ignoring  
allegations of harassment  
and participating in conduct  
non-complying with code of  
conduct

b. (1) Count II: insufficient Request / grievance process

- (2) Supporting Facts: request / grievance

process is insufficient due to  
no grievance or grievance appeal  
options available on all  
requests

c. (1) Count III: Discrimination and harassment

(2) Supporting Facts: I experienced unfair treatment due to my pro se status on case by one Deputy James pleashull on and off duty by slandering my name and spreading rumors to public and inmates

D. INJURY

1. How have you been injured by the actions of the defendant(s)?

yes, I was held in confinement and denied several penal rights and constitutional rights were violated due to all 3 counts and insufficient law library

E. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

1. Have you filed other lawsuits in state or federal court that deal with the same facts that are involved in this action or otherwise relate to the conditions of your imprisonment?  
YES ☒ / NO ☐. If your answer is "YES," describe each lawsuit. (If there is more than one lawsuit, describe additional lawsuits on additional separate pages, using the same outline.)

- a. Parties to previous lawsuit:

Plaintiff(s): Jerry Ernest Lopez  
Defendant(s): Davis County

- b. Name of court and case or docket number: 1:21 cv 114

c. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_

d. Issues raised: still pending

e. When did you file the lawsuit? \_\_\_\_\_  
Date Month Year

f. When was it (will it be) decided? unknown

2. Have you previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C? YES ☒ / NO \_\_\_\_\_. If your answer is "YES" briefly describe how relief was sought and the results. If your answer is "NO" explain why administrative relief was not sought.

\$748.00 a day for unlawful Detention  
and \$10,000.00 a day for any days  
over Sentence plus pain and  
suffering / still pending

#### F. REQUEST FOR RELIEF

1. I believe that I am entitled to the following relief:

Compensation for pain and  
suffering due to slander and  
harrassment caused public to  
lash out verbally and physically

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint, and that the information contained therein is true and correct. 28 U.S.C. §1746; 18 U.S.C. §1621.

Executed at South Salt Lake city on 1-20 2022  
(Location) (Date)

[Signature]  
Signature